

1 Nicholas M. Wajda (Nev. Bar No. 11480)
2 Law Offices of Nicholas M. Wajda, Esq.
3 871 Coronado Center Drive
4 Suite 200
5 Henderson, Nevada 89052
+1 702-900-6339
nick@wajdalawgroup.com
Attorney for the Plaintiff

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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8

9 VERONICA DUNCAN, individually, and on
10 behalf of all others similarly situated,

11 Plaintiff,

12 v.

13 FIRST NATIONAL COLLECTION
14 BUREAU, INC.,

15 Defendant.

Case No. 2:21-cv-01848-GMN-EJY

**~~PROPOSED~~ STIPULATED DISCOVERY
PLAN AND SCHEDULING ORDER**

SCHEDULING REVIEW REQUESTED

16 Plaintiff Veronica Duncan (“Plaintiff”) and Defendant First National Collection Bureau,
17 Inc. (“Defendant”) (collectively “the parties”), by and through their respective counsel of record,
18 submit their Stipulated Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26(f)
19 and LR 26-1 as follows:
20

21 **Pursuant to Rule 26(f), the parties met and conferred on February 23, 2022.**

22 **(1) Discovery Cut-Off Date:** December 31, 2022. Given that this case is a class action, a
23 discovery schedule that exceeds 180 days is appropriate because class discovery is
24 significantly more burdensome and time consuming than individual discovery. Specifically,
25 the process of identifying putative class members by name may take months in of itself, as
26 it would require Defendant to search its records for accounts that contain certain codes that
signify that a pre-recorded message call was placed. This undertaking may take several
months for Defendant to complete.

27 a. **Date of Defendant’s Answer:** December 22, 2021.

1 b. **Last Date to File Discovery Motions:** December 31, 2022.

2 **(2) Amending the Pleadings and Adding Parties:** March 31, 2023.

3 **(3) Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** August 30, 2022.

4 a. **Disclosure of Rebuttal Experts:** September 21, 2022.

5 **(4) Dispositive Motions:** January 30, 2023.

6 **(5) Pretrial Order:** March 1, 2023.

7 **(6) Fed. R. Civ. P. 26(a)(3) Disclosures:** March 1, 2023.

8 **(7) Alternative Dispute Resolution.** The parties certify that they met and conferred about the
9 possibility of using alternative dispute-resolution processes including mediation,
10 arbitration, and if applicable, early neutral evaluation. The parties believe that this case is
11 best suited for mediation.

12 **(8) Alternative Forms of Case Disposition:** The parties certify that have considered consent
13 to trial by a magistrate judge and have chosen to not to consent.

14 **(9) Electronic Evidence:** The parties certify that have discussed ESI and have agreed to
15 produce all ESI in .pdf format.

16 **(10) Deadline to File Class Certification Motion:** August 31, 2022

17 *By: /s/ Nicholas M. Wajda*
18 Nev. Bar No. 11480
WAJDA LAW GROUP, APC
871 Coronado Center Drive
Suite 200
Henderson, Nevada 89052
+1 702-900-6339
nick@wajdalawgroup.com
Attorney for the Plaintiff

19 *By: /s/Kurt R. Bonds*
ALVERSON TAYLOR &
SANDERS
KURT R. BONDS, ESQ.
Nevada Bar #6228
6605 Grand Montecito Parkway
Suite 200
Las Vegas, Nevada 89149
(702) 384-7000
efile@alversontaylor.com
*Attorneys for First National
Collection Bureau, Inc.*

20 **IT IS SO ORDERED.**

21 
U.S. MAGISTRATE JUDGE

22 **Dated: February 23, 2022**